

## RESPONSE TO COMMENTS

This document has been prepared in accordance with Tennessee Rule 1200-1-11-.07(7)(j). It has resulted from the Tennessee Division of Solid Waste Management's proposal to issue a Class 2 permit modification to U.S. Department of Energy (DOE) and Bechtel Jacobs Company LLC, EPA I.D. Number TN3 89 009 0001, located at DOE Y-12 National Security Complex, Oak Ridge, Tennessee, with a Tennessee Permit Number TNH-116. The purpose of this Class 2 modification is to address the network of groundwater monitoring wells specified for the RCRA post-closure corrective action monitoring at the S-3 site, the Oil Landfarm, and the Bear Creek Burial Grounds/Walk-In Pits. Specifically, the modification will replace plume boundary well GW-715 with spring SS-6, which discharges into the main channel of Bear Creek about 500 feet downstream (east-southeast) of the well. The well has deteriorated to the point that it no longer serves the purpose of a plume boundary monitoring well in accordance with the post-closure permit.

Section A of this document describes the efforts made by (DOE) and Bechtel Jacobs Company LLC, to obtain public input. Section B summarizes and responds to all significant comments received.

### A. Public Involvement Opportunities

A public notice was prepared by DOE and Bechtel Jacobs Company LLC of its Class 2 modification request, as required by Tennessee Rule 1200-1-11-.07(9)(c)5(ii)(II)-(V). This notice was published in the The Knoxville News-Sentinel, The Oak Ridger, and the Roane County News, on March 12, 2004; and the Loudon County News-Herald on March 10 and 11, 2004.

The public notice advised the public that a copy of the Class 2 permit modification request was available for review at the DOE Information Center, 475 Oak Ridge Turnpike, Oak Ridge, Tennessee. The public notice also established a 60-day comment period, which began on March 12, 2004, and ended on May 11, 2004. The public notice also stated that a public meeting would be held on April 15, 2004, at 7 p.m., by DOE and Bechtel Jacobs Company LLC, at the DOE Information Center, Main Conference Room, 475 Oak Ridge Turnpike, Oak Ridge, Tennessee, and described how interested persons could comment in writing on the proposed action.

### B. Public Comment/Response Summary

One member of the public attended the public meeting conducted by DOE and Bechtel Jacobs Company LLC on April 15, 2004. Some oral comments were received from the one member during the public meeting and they are addressed below. No written comments were received from the public during this comment period.

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### RESPONDED BY U.S. DEPARTMENT OF ENERGY AND BECHTEL JACOBS COMPANY LLC

1. **Comment:** Are volatile organic compounds (VOCs) a concern in this portion of the BCHR?

**Response:** Generally, VOCs are not a concern in this portion of the BCHR. The RCRA post-closure permit requires monitoring for selected VOCs indicative of source area plume migration. Migration of these VOCs has not been indicated to date.

2. **Comment:** Have sampling methods changed over time?

**Response:** Yes, sampling methods have changed from a three-volume purge method to a low-flow method. The change in sampling methods did result in some trend changes for some constituents over time, indicating sensitivity to the sampling method.

3. **Comment:** Who will do future sampling?

**Response:** The Bechtel Jacobs Company LLC Sampling Services Subcontractor, currently MDM, Inc., will have the responsibility for future sampling of the RCRA post-closure monitoring locations.

4. **Comment:** Is the Western Picket wells monitoring included in the Remediation Effectiveness Report?

**Response:** Yes, the Western Picket is included as part of the Bear Creek Watershed Phase I Record of Decision (ROD) and monitors the boundary between Zone 1 (unrestricted land use) and Zone 2 (recreational land use) within the watershed. As such, data from the Western Picket wells are evaluated and included in the annual Remediation Effectiveness Report.